

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Post-Effective Date Debtor.

Chapter 11

Case No. 25-10068 (CTG)

Re: Docket No. _____

**CONSENT ORDER APPROVING JOINT STIPULATION
REGARDING CLAIMS OF LA HABRA WESTRIDGE PARTNERS, L.P.**

Pursuant to and in accordance with the *Joint Stipulation Regarding Pending Claims* (the “Stipulation”)² attached hereto as **Exhibit 1**, and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief set forth herein is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and with the consent of the Parties; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor's mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

1. The Stipulation is hereby approved and the terms of the Stipulation are hereby made effective by this Consent Order.

2. Sufficient notice of this Consent Order has been provided and the requirements of Rule 3007 of the Federal Rules of Bankruptcy Procedure and any applicable local rules of this Court are otherwise satisfied.

3. Notwithstanding any applicable rules to the contrary, this Consent Order shall be immediately binding and enforceable upon its entry.

4. The Debtors and the Plan Administrator are authorized to take all actions necessary to effectuate the relief granted in this Consent Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Consent Order.

Exhibit 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Debtor.

)
)
)
)
)
)
)

Chapter 11

Case No. 25-10068 (CTG)

**JOINT STIPULATION REGARDING
CLAIMS OF LA HABRA PARTNERS, L.P.**

Ann Aber, the Plan Administrator, for and on behalf of the Debtors (collectively, “Debtors”), La Habra Westridge Partners, L.P. (“Landlord” and together with the Debtors, collectively, the “Parties”), by and through their undersigned counsel, hereby enter into this stipulation (this “Stipulation”) as to the following:

1. The Landlord’s lease was rejected effective May 31, 2025.
2. On or about April 1, 2025, Landlord filed a Proof of Claim designated as Claim No. 10393. Claim No. 10393 asserts claims totaling \$103,437.46, including administrative expense claims totaling \$56,661.36
3. Claim No. 10393 has been paid in part, as Landlord acknowledges the subsequent receipt of its administrative rent claim for April 2025, leaving the remainder of the administrative claim for the second half of 2024/25 real estate taxes, which remain due, subject to adjustment for the rejection date.
4. Plan Administrator and the Landlord hereby agree to resolve the administrative claims set forth in Claim No. 10393 by the payment of \$29,646.61, and further agree that upon

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Landlord's receipt of such payment the administrative expense claims set forth in Claim No. 10393 shall be deemed withdrawn with prejudice.

5. On or about June 17, 2025, Landlord filed a Proof of Claim designated as Claim No. 18707. Claim No. 18707 asserts claims totaling \$706,693.64, including administrative expense claims totaling \$42,900.00.

6. The \$42,900.00 claim consists of clean-out expenses.

7. Debtors and the Landlord hereby agree to resolve the administrative claims set forth in Claim No. 18707 by re-classifying the entirety of Claim No. 18707, including the administrative expense claim of \$42,900.00, as a general unsecured claim.

8. This Stipulation resolves *Plan Administrator's Seventeenth (Substantive) Omnibus Objection to Certain Claims (Unliquidated Claims and Overstated Claims)* [Docket No. 1860] [Docket No. 1860] (the "Overstated Objection") solely as to Claim No. 10393. The Parties stipulate and agree that the Plan Administrator may prepare and submit any order in respect of the Overstated Objection that is consistent with this Stipulation.

9. Nothing contained herein constitutes the allowance of any unsecured claim of Landlord.

STIPULATED and AGREED this 17th day of December, 2025:

[Signature Page Follows]

Dated: December 17, 2025
Wilmington, Delaware

/s/ Ronald K. Brown, Jr.

Law Offices of Ronald K. Brown, Jr., APC

Ronald K. Brown, Jr.
901 Dove St., Suite 120
Newport Beach, CA 92660
Telephone: (949) 250-3322
Email: ron@rkbrownlaw.com

Counsel to La Habra Westridge Partners, L.P.

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Jack M. Dougherty (No. 6784)
Michael E. Fitzpatrick (No. 6797)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
jdougherty@coleschotz.com
mfitzpatrick@coleschotz.com

- and -

HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*)
Philip K. Stovall (admitted *pro hac vice*)
200 Public Square, Suite 2800
Cleveland, Ohio 44114
Telephone: (216) 274-2489
Facsimile: (216) 241-2824
Email: cwick@hahnlaw.com
pstovall@hahnlaw.com

Co-Counsel to the Plan Administrator